

2
AUSA

1
2
3
4
5 UNITED STATES DISTRICT COURT
6 SOUTHERN DISTRICT OF CALIFORNIA

7
8 UNITED STATES OF AMERICA,

9 Plaintiff,

10 v.

11 Raul CARRANZA-Ambriz

12
13
14 Defendant.

) Mag. Case No. '08 MJ 8495

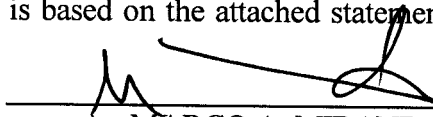
) COMPLAINT FOR VIOLATION OF:

) Title 8, U.S.C., Section 1324 (a)(1)(A)(ii)
) Illegal Transportation of Aliens

15 The undersigned complainant, being duly sworn, states:

16
17 On or about June 2, 2008, within the Southern District of California, defendant Raul
18 CARRANZA-Ambriz with the intent to violate the immigration laws of the United States, knowing
19 and in reckless disregard of the fact that aliens, namely, Maria NAVARRO-Salmeron, Jose
20 GOMEZ-Villafan, and Rodolfo SOLANO-Serapio had come to, entered and remained in the
21 United States in violation of law, did transport and move, said aliens within the United States in
22 furtherance of such violation of law; in violation of Title 8, United States Code, Section
23 1324(a)(1)(A)(ii).

24 And the complainant states that this complaint is based on the attached statement of facts,
25 which is incorporated herein by reference.

26
27 
28 MARCO A. MIRANDA
29 Senior Patrol Agent

SWORN TO BEFORE AND SUBSCRIBED IN MY PRESENCE THIS 3rd DAY OF JUNE 2008.

27
28 
29 PETER C. LEWIS
United States Magistrate Judge

1 UNITED STATES OF AMERICA

2 v.

3 Raul CARRANZA-Ambriz

4 STATEMENT OF FACTS

5 The complainant states this complaint is based upon statements in the
6 investigative reports by the apprehending agent, J. Garcia, on June 2, 2008, the
7 defendant, Raul CARRANZA-Ambriz, an illegal alien, was apprehended near
8 Westmorland, CA as the driver of a 1999 Chevrolet Suburban, bearing California
9 license 4LXN619, as he smuggled seventeen undocumented aliens in violation of law.

10 While assigned to Border Patrol Checkpoint duties, Agent Garcia observed two
11 vehicles turn northbound onto Highway 86. One of the vehicles, a maroon Chevrolet
12 Suburban was riding low and was extremely dusty. Agent Garcia followed the
13 Suburban and attempted to drive next to the Suburban. The driver, later identified as
14 Raul CARRANZA-Ambriz, accelerated and prevented Agent Garcia from seeing inside
15 the vehicle. Using the vehicle's emergency lights and sirens, Agent Garcia attempted
16 to perform a vehicle stop. CARRANZA-Ambriz ignored the lights, sirens and continued
17 driving northbound on Highway 86. Agent Newland positioned himself on the side of
18 the highway and attempted to deploy a Controlled Tire Deflation Device (CTDD), but
19 the vehicle suddenly changed directions of travel and proceeded southbound on
20 Highway 86. As the vehicle turned around, Agent Garcia could clearly identify see the
21 driver had short hair, mustache and was wearing a gray T-shirt.

22 As CARRANZA-Ambriz continued driving southbound on Highway 86, another
23 agent attempted to deploy a CTDD, but CARRANZA-Ambriz was able to swerve and
24 avoid the CTDD. Agent Gibson positioned himself further south of their location was
25 able to successfully deploy a CTDD, deflating two of the vehicle's tires. CARRANZA-
26 Ambriz drove for approximately 100 yards and stopped on the side of the road. As the
27 vehicle came to a stop, Agent Garcia could clearly see CARRANZA-Ambriz attempting
28 to climb out of his seat and into the rear passenger area. CARRANZA-Ambriz
29 attempted to abscond. Agent Carney was able to apprehend CARRANZA-Ambriz.

1 All of the occupants of the vehicle were contained before they were able to
2 abscond. Agent Garcia identified himself as a United States Border Patrol Agent and
3 questioned all subjects as to their citizenship. All the suspected illegal aliens claimed to
4 be citizens of Mexico without documents that would allow them to live, work, or remain
5 in the United States legally. Agent Garcia arrested all of the subjects and transported
6 them to the Highway 86 Checkpoint.

7 Agent Garcia advised Raul CARRANZA-Ambriz of his Miranda rights.
8 CARRANZA-Ambriz acknowledged understanding his rights and was willing to answer
9 any questions without an attorney present. CARRANZA-Ambriz stated after his illegal
10 entry, he met an unknown man at Wal-Mart and made arrangement to be smuggled to
11 Los Angeles, CA for a fee of \$1,000.00. CARRANZA-Ambriz stated he was driving the
12 illegal aliens to Los Angeles.

13 Material Witnesses Maria NAVARRO-Salmeron, Jose GOMEZ-Villafan and
14 Rodolfo SOLANO-Serapio stated they are citizens of Mexico illegally in the United
15 States. Maria NAVARRO-Salmeron and Jose GOMEZ-Villafan stated Jose GOMEZ-
16 Villafan's brother made the arrangements to be smuggled into the United States, but
17 was unsure on the amount he was going to pay for being smuggled. Rodolfo SOLANO-
18 Serapio stated his girlfriend made the arrangement for him to be smuggled into the
19 United States for an unknown fee.

20 Maria NAVARRO-Salmeron, Jose GOMEZ-Villafan, and Rodolfo SOLANO-
21 Serapio were shown a six pack photo line up and they all positively identified Raul
22 CARRANZA-Ambriz as the driver of the Chevrolet Suburban that picked them up and
23 was driving the sedan.

24 The complainant states that the names of the Material Witnesses are as follows:

<u>NAME</u>	<u>PLACE OF BIRTH</u>
Maria NAVARRO-Salmeron	Mexico
Jose GOMEZ-Villafan	Mexico
Rodolfo SOLANO-Serapio	Mexico

1 Further, complainant states that Maria NAVARRO-Salmeron, Jose GOMEZ-
2 Villafan, and Rodolfo SOLANO-Serapio, are citizens of a country other than the United
3 States; that said aliens have admitted that they are deportable; that their testimony is
4 material, that it is impracticable to secure their attendance at the trial by subpoena; and
5 they are material witnesses in relation to this criminal charge and should be held or
6 admitted to bail pursuant to Title 18, United States Code, Section 3144.